

Eric E. Rothstein
Attorney for Benjamin Plaza, Jr., Creditor
Rothstein Law PLLC
The Woolworth Building
233 Broadway, Suite 900
New York, New York 10279
(212) 577-9797

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

In re:

MICHAEL HEILBRON,

Debtor.

BENJAMIN PLAZA, JR.,
Chapter 7 Creditor

Plaintiff.

v.

MICHAEL HEILBRON,

Defendant.

Chapter 7

Case No. 1-18-42486 (ESS)

NOTICE OF MOTION

Adv. Proc. No. 1-18-01055 (ESS)

C O U N S E L O R S:

PLEASE TAKE NOTICE, that on January 31, 2019, plaintiff, BENJAMIN PLAZA, JR., by his attorneys, ROTHSTEIN LAW PLLC, shall apply to the Honorable Elizabeth S. Stong, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Eastern District of New York, located at 271-C Cadman Plaza East, Brooklyn, New York, for an Order:

1) Denying MICHAEL HEILBRON, dischargeability pursuant to Sections 523 and 1328 of the Bankruptcy Code; and

2) Such other, further or different relief, which this Court may deem just and proper.

Dated: New York, New York
December 20, 2018

ROTHSTEIN LAW PLLC

By: s/ Eric E. Rothstein

Eric E. Rothstein
Attorney for Benjamin Plaza, Jr., Creditor
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To: George Bassias, Esq.
Attorney for MICHAEL HEILBRON
(via ECF)

CERTIFICATE OF SERVICE

I hereby certify that on December 20, 2018, I electronically filed a copy of the foregoing Notice of Motion by email to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

Dated: New York, New York
December 20, 2018

s/ Eric E. Rothstein
Eric E. Rothstein
Attorney for Benjamin Plaza, Jr., Creditor
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**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

In re: MICHAEL HEILBRON,

Debtor,

BENJAMIN PLAZA, JR.,
Chapter 7 Creditor,

Plaintiff,

- against -

MICHAEL HEILBRON,

Defendant.

NOTICE OF MOTION

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